

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

**HEARING: July 10, 2025 (10:00 a.m.)**  
**OBJECTIONS: June 26, 2025 (5:00 p.m.)**

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:  
**In re HELEN RACANELLI,** : Case No. 16-22617-SHL  
:  
**Debtor.** : (Chapter 11)  
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:  
**In re JOSEPH T. GRANCHELLI,** : Case No. 18-23674-SHL  
:  
**Debtor.** : (Chapter 11)  
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**NOTICE OF ADJOURNMENT OF HEARING ON UNITED STATES TRUSTEE'S  
MOTION FOR ORDER: (I) VACATING ORDER AUTHORIZING EMPLOYMENT  
OF DEBTOR'S COUNSEL, LINDA M. TIRELLI, ESQ, (II) REQUIRING RETURN  
OF ALL FEES PAID; AND (III) IMPOSING SANCTIONS**

**PLEASE TAKE NOTICE** that the hearing on the motion of William K. Harrington, United States Trustee, for an order: (I) vacating the orders authorizing the retention and employment of Linda M. Tirelli's Esq., as counsel to the debtors and debtors in possession in the chapter 11 cases captioned above; (II) requiring the return of all fees for legal services paid to Ms. Tirelli in the cases; and (III) imposing sanctions against Ms. Tirelli in the discretion of the Court, and for such other and further relief as this Court may deem just and proper, has been adjourned.

**The adjourned hearing will take place before the Honorable Sean H. Lane, United States Bankruptcy Judge, in the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York, on July 10, 2025, at 10:00 a.m.**

**PLEASE TAKE FURTHER NOTICE**, that parties wishing to appear at the hearing, whether making a "live" or a "listen only" appearance before the Court, must make an electronic appearance using the Electronic Appearance portal located at the Court's website at: [USBC-SDNY \(uscourts.gov\)](https://usbc-sdny.uscourts.gov). Appearances must be entered no later than July 9, 2025, at 4:00 p.m. (prevailing Eastern time). After this deadline has passed, parties who have made their electronic appearance through the Court's website to appear via Zoom for Government will receive an

invitation from the Court with a Zoom link that will allow them to attend the hearing. Requests to receive a Zoom link should not be emailed to the Court, and the Court will not respond to late requests that are submitted on the day of the hearing. Further information on the use of Zoom for Government can be found at the Court's website at: [Zoom Video Hearing Guide | Southern District of New York | United States Bankruptcy Court \(uscourts.gov\)](#).

**PLEASE TAKE FURTHER NOTICE**, that objections or other responses, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules of the Southern District of New York, (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties in interest must file on a 3.5-inch disk (preferably in Portable Document Format, or PDF, WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Sean H. Lane, and (e) be served upon the United States Trustee, Alexander Hamilton Custom House, Room 534, New York, New York 10004 (Attn: Andrew D. Velez-Rivera), **no later than the return date set forth above, June 26, 2025 (5:00 p.m.)**. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response.

Dated: New York, New York  
April 10, 2025

Respectfully submitted,

WILLIAM K. HARRINGTON  
UNITED STATES TRUSTEE

By: /s/ Andrew D. Velez-Rivera  
Trial Attorney  
Office of the U.S. Trustee  
Alexander Hamilton Custom House  
One Bowling Green, Room 534  
New York, New York 10004  
Tel. (212) 510-0500; Fax (212) 668-2255

## CERTIFICATE OF SERVICE

[illegible]

I, Andrew D. Velez-Rivera, hereby declare, under penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that on March 12, 2025, I caused to be served a copy of the Notice of Adjournment of Hearing on United States Trustee's Motion for Order: (I) Vacating Order Authorizing Employment of Debtor's Counsel, Linda M. Tirelli, Esq., (II) Requiring Return of All Fees Paid, and (III) Imposing Sanctions ("Motion"), the Memorandum of Law in Support of the Motion, and the Declaration of Andrew D. Velez-Rivera in Support of the Motion, by regular mail upon each of the parties listed on the attached service list by depositing true copies of same in sealed envelopes, with postage pre-paid thereon, in an official depository of the United States Postal Service within the City and State of New York.

Dated: New York, New York

/s/ Andrew D. Velez-Rivera

## SERVICE LIST

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